§103(a) as being unpatentable over Hitchcock et al.; and (3) objected to claims 38, 50, and 62 as being dependent upon a rejected base claim.

Claims 1-63 are pending in the application.

Applicants would like to thank the Examiner for indicating that claims 38, 52, and 62 include allowable subject matter.

On March 13, 2001, Examiner Harris was kind enough to grant Applicant's representative an interview. The interview was attended by Examiner Harris, Examiner Cheng, and the undersigned. During the interview, the undersigned discussed the deficiencies of the Hitchcock et al. reference. The undersigned agreed to formalize the arguments by way of this Request for Reconsideration, and in response the Examiner agreed to reconsider the relevance of the Hitchcock et al. reference.

Hitchcock et al. is directed to a system and method for training a user on computer software applications. These computer software applications may include standard computer applications (such as Microsoft Word or Excel), specialized computer applications, Internet applications, or network infrastructure configurations. These network infrastructure configurations may encompass the use of printers, routing in the network, and other operations performed over the network.

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In the system of Hitchcock et al., a user connects to a distribution engine to receive the training regarding a computer application rather than connecting to the application themselves. The distribution engine includes the following modules: diagnostic, prescription, learning treatments, measurement, and feedback. (col. 4 ll. 8-13). Further, the distribution engine is described as a computer program that can be loaded on to a server. (col. 9, ll. 30-31).

The diagnostic software module is then used to diagnose the skill level of the user. This is accomplished by asking the user a series of questions. The user's answers are then evaluated to diagnose their skill level. The diagnostic software module is described as comprising at least one computer application (col. 4 ll. 31-47).

Next, a prescription software module evaluates the user's answers and determines a prescription having the treatment necessary for the user to meet a minimum skill level in the computer application. (col. 4 ll. 48-56).

Next, a learning treatment tailored to the needs of the user is determined. The learning treatment module is described as at least one software program. Hitchcock et al. discloses that these learning treatments may be dynamic help, job aids, modular computer-based training (CBT) and classroom training. (col. 4 ll. 61-67). Further,

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Hitchcock et al., discloses that the treatments are contained within the distribution engine (col. 4 ll. 24-25).

Hitchcock et al. describes dynamic help as a software program that can collect questions from individual users. Then, answers to these questions can later be posted on, for example, a bulletin board. (col. 5 ll. 10-15). Hitchcock et al. describes job aids as software programs that can be used to describe procedures for computer software application use. (col. 5 ll. 15-21). Hitchcock et al. further discloses that the learning prescription may include computer based training (CBT) modules. These are described as software modules. (col. 5 ll. 31-35).

In contrast, independent claim 1 of the present invention recites, in part,

a system for training a user regarding controlling of a device, comprising:

> a user computer for accepting device control information reflecting at least one instruction regarding to a task to be performed as part of a training exercise; and
> a device controller remotely connected to the user computer, including
> means for receiving the device control information, and
> means for transferring the device control information to the device so that the user can exercise control over the device for the purposes of training.

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As such, the present invention is directed to methods and systems for training a user with regard to a device in which the user exercises control over the device they are being trained on during the training.

Hitchcock et al., however, does not teach or suggest a user remotely accessing a device for the purposes of training on that device. Rather, Hitchcock et al. merely discloses a user remotely accessing a distribution engine that includes dynamic help, job aids, or CBT modules (software) for the purposes of training on a computer application. In fact, Hitchcock et al. does not even teach a user remotely accessing the computer applications themselves that the user is being trained on themselves for the purposes of training, but rather merely accessing the distribution engine's dynamic help, job aids, and CBT modules. Accordingly, Hitchcock et al. does not teach or suggest the user's remotely exercising control over a device that they are being trained to control.

In summary, Hitchcock et al. does not teach or suggest a device controller remotely connected to the user computer, including means for receiving the device control information, and means for transferring the device control information to the device so that the user can exercise control over the device for the purposes of training, as recited in independent claim 1.

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Applicants further submit that for these same reasons, Hitchcock et al. does not teach or suggest the invention as claimed in independent claims 7, 13, and 19.

Applicants therefore respectfully request that the Examiner reconsider and withdraw the rejections of independent claims 1, 7, 13,19, under 35 U.S.C. §102(e) as being anticipated by Hitchcock et al. Applicants further submit that claims 2-6, 8-12, 14-18, 19-26 that depend directly on independent claims 1, 7, 13, and 19, are likewise allowable, at least due to their dependence on independent claims 1, 7, 13, and 19.

With regard to independent claim 27, this claim recites, in part, a method for training a user to operate a set of one or more devices, comprising the steps of:

> receiving control information at [a] device controller reflecting at least one instruction from the client computer regarding at least one task to be performed as part of the training exercise; and
>
> transmitting the control information from the device controller to at least one of the devices in the set of one or more devices so that the user can exercise control over the set of one or more devices for the purposes of training the user in the operation of the set of one or more devices.

As discussed above, Hitchcock et al. does not teach or suggest a user actually exercising control over the device that they are being trained to operate. Rather, Hitchcock et al. merely teaches that a user can receive training by accessing a

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distribution engine (a computer program) to receive dynamic help, job aids, modular computer-based training (CBT), etc. (col. 5 ll. 24-28).

Accordingly, Applicants respectfully submit that Hitchcock et al. does not teach or suggest receiving control information at a device controller, and transmitting the control information from the device controller to at least one of the devices in a set of one or more devices so that the user can exercise control over the set of one or more devices for the purposes of training the user in the operation of the set of one or more devices.

Applicants further submit that for at least these same reasons, Hitchcock et al. does not teach or suggest the invention as recited in independent claims 27, 40, and 52.

Accordingly, Applicants respectfully request that the Examiner reconsider and withdraw the rejection of independent claims 27, 40, and 52 under 35 U.S.C. §102(e) as being anticipated by Hitchcock et al. Applicant further respectfully submit that claims 28-39, 41-51, and 53-63 that depend directly or indirectly on independent claims 27, 40, and 52, are likewise allowable at least due to their dependence on independent claims 27, 40, and 52.

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In addition to the above-stated reasons, Applicants further respectfully submit that dependent claim 33 is also allowable over Hitchcock et al. for at least the additional reason that Hitchcock et al. does not teach or suggest transmitting control information to a network device that the user is being trained to operate. The Examiner rejected this claim under 35 U.S.C. §102(e) as anticipated by Hitchcock et al. Dependent claim 33 recites:

> The method of claim 27, wherein at least one of the devices is a network device.

Applicants respectfully submit for at least the reasons discussed above, Hitchcock et al. does not teach or suggest a method for training a set of one or more devices including a network device, wherein the user exercises control over the network device that they are being trained to operate. As such, Applicants respectfully submit that Hitchcock et al. does not teach or suggest transmitting control information from a device controller to at least one of the devices in the set of one or more device so that the user can exercise control over the set of one or more devices for the purposes of training the user in the operation of a set of one or more devices wherein at least one of the devices is a network device.

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